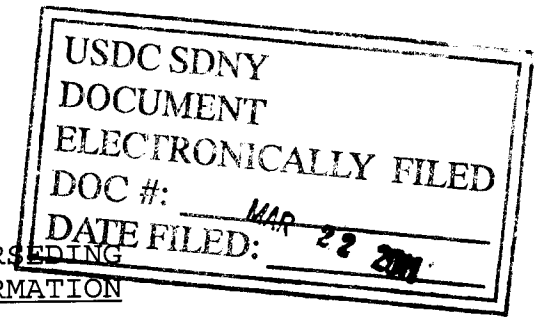


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x  
:  
UNITED STATES OF AMERICA  
:  
- v. -  
:  
VAUGHAN RICHMOND,  
:  
Defendant.  
:  
- - - - - x

SUPERSEDEDING  
INFORMATION

S1 10 Cr. 243 (VM)



COUNT ONE

(Conspiracy To Commit Wire and Bank Fraud)

The United States Attorney charges:

1. From at least in or about 2004, up to and including in or about 2007, in the Southern District of New York and elsewhere, VAUGHAN RICHMOND, the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate Sections 1343 and 1344 of Title 18, United States Code.

2. It was a part and an object of the conspiracy that VAUGHAN RICHMOND, the defendant, and others known and unknown, unlawfully, willfully, and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire and radio communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing

such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

3. It was further a part and an object of the conspiracy that VAUGHAN RICHMOND, the defendant, and others known and unknown, unlawfully, willfully, and knowingly would and did execute and attempt to execute a scheme and artifice to defraud financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institutions, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

OVERT ACTS

4. In furtherance of the conspiracy and to effect the illegal objects thereof, VAUGHAN RICHMOND, the defendant, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. In or about February 2006, RICHMOND submitted and caused to be submitted false residency and income information, among other things, to Countrywide Mortgage Corporation in order to procure home mortgage loans in the amount of approximately \$440,000 for the purchase of a residential property at 1324 Admiral Lane, Uniondale, New York.

b. In or about March 2006, RICHMOND submitted and caused to be submitted false residency, employment and financial information, among other things, to Aurora Bank, FSB, in order to procure home mortgage loans in the amount of approximately \$1,350,000 for the purchase of a residential property at 449 West 162nd Street, New York, New York.

c. In or about March 2006, RICHMOND submitted and caused to be submitted false residency and income information, among other things, to Weyerhaeuser Mortgage Company in order to procure home mortgage loans in the amount of approximately \$800,000 for the purchase of a residential property at 203 Cathedral Avenue, Hempstead, New York.

(Title 18, United States Code, Section 1349.)

COUNT TWO  
(Bank Fraud)

The United States Attorney further charges:

5. In or about February 2006, in the Southern District of New York and elsewhere, VAUGHAN RICHMOND, the defendant, unlawfully, willfully, and knowingly, did execute and attempt to execute a scheme and artifice to defraud a financial institution, to wit, Countrywide Mortgage Corporation, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain the moneys, funds, credits, assets, securities and other property owned by, and under the custody and control of, such a financial institution, by means of

false and fraudulent pretenses, representations, and promises, to wit, RICHMOND and others known and unknown submitted and caused to be submitted a loan application containing materially false and fraudulent statements to Countrywide Mortgage Corporation in order to procure home mortgage loans in the amount of approximately \$440,000 for the purchase of a residential property at 1324 Admiral Lane, Uniondale, New York.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT THREE  
(Bank Fraud)

The United States Attorney further charges:

6. In or about March 2006, in the Southern District of New York and elsewhere, VAUGHAN RICHMOND, the defendant, unlawfully, willfully, and knowingly, did execute and attempt to execute a scheme and artifice to defraud a financial institution, to wit, Aurora Bank, FSB, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain the moneys, funds, credits, assets, securities and other property owned by, and under the custody and control of, such a financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, RICHMOND and others known and unknown submitted and caused to be submitted a loan application containing materially false and fraudulent statements to Aurora Bank, FSB, in order to procure home mortgage loans in

the amount of approximately \$1,350,000 for the purchase of a residential property at 449 West 162nd Street, New York, New York.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT FOUR  
(Bank Fraud)

The United States Attorney further charges:

7. In or about March 2006, in the Southern District of New York and elsewhere, VAUGHAN RICHMOND, the defendant, unlawfully, willfully, and knowingly, did execute and attempt to execute a scheme and artifice to defraud a financial institution, to wit, Weyerhaeuser Mortgage Company, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain the moneys, funds, credits, assets, securities and other property owned by, and under the custody and control of, such a financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, RICHMOND and others known and unknown submitted and caused to be submitted a loan application containing materially false and fraudulent statements to Weyerhaeuser Mortgage Company in order to procure home mortgage loans in the amount of approximately \$800,000 for the purchase of a residential property at 203 Cathedral Avenue, Hempstead, New York.

(Title 18, United States Code, Sections 1344 and 2.)

FORFEITURE ALLEGATION

8. As a result of committing the offenses alleged in Counts One through Four of this Superseding Information, VAUGHAN RICHMOND, the defendant, shall forfeit to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 982(a)(2), and 28 U.S.C. § 2461, any property constituting or derived from proceeds obtained directly or indirectly as a result of the bank fraud and conspiracy to commit wire and bank fraud offenses, including but not limited to a sum of money equal to \$9,170,000 in United States currency, in that such sum in aggregate is property representing the amount of proceeds obtained as a result of the offenses.

Substitute Asset Provision

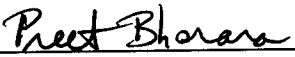

9. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to 18 U.S.C.

§ 982(b) and 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981, 982, and 1344, and Title 28, United States Code, Section 2461, and Title 21, United States Code 853.)

  
\_\_\_\_\_  
PREET BHARARA   
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

VAUGHAN RICHMOND,

Defendant.

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INFORMATION

S1 10 Cr. 243 (VM)

(18 U.S.C. §§ 1344, 1349, and 2)

PREET BHARARA

United States Attorney.

\* Filed Waiver of Indictment + Information  
Def. pres. with attorney Mr. Jacobs.  
AUSA Mr. Anderson Court Reporter Pres.  
Interpreter pres/not pres. Def. withdraws plea of not guilty & enters a plea  
of guilty to count(s) 1, 2, 3 + 4. PSI Ordered. Sentence Not Set.  
Bail Cont.  
Mag. Judge Francis recommends Judge Marrero.  
accept the guilty plea.

Francis  
U.S.M.J.

3-22-11  
VO